

UNITED STATES DISTRICT COURT
District of South Carolina
Columbia Division

Vagish, LLC, doing business as Cambridge
Plaza Hotel, and Va Va Vagish, LLC, doing
business as Legends Lounge,

Plaintiff,

vs.

Seneca Specialty Insurance Company,

Defendant.

C/A No.: 3:13-cv-03161-TLW

Amended
**Plaintiffs' Responses to Local Civil Rules
26.03 Interrogatories**

Pursuant to Rule 26.03 of the Local Rules of the United States District for the District of South Carolina Plaintiffs Vagish, LLC, doing business as Cambridge Plaza Hotel, and Va Va Vagish, LLC, doing business as Legends Lounge, (hereinafter "Plaintiffs") make the following supplemental report to the Court:

RULE 26.03

2. The names of fact witnesses likely to be called by the party and a brief summary of their expected testimony.

RESPONSE: Plaintiff identifies the following:

Heidi Michelle Bland
1301 High Street, #5
Denver, CO 80218

Ms. Bland is a former employee of the Plaintiffs. She is expected to testify as to her personal knowledge of the allegations set forth in the Complaint and other pleadings.

Tim Jones
Lane Sturkie
Becky Sturkie
Angie Anderson
Palmetto Design Associates, Inc

636 Pine Ridge Drive
West Columbia, SC 29172

Mr. Jones and his employees were retained by Plaintiff to design, estimate and perform scheduled renovations and improvements to the Property, including improvements and renovations required under the franchise agreement with Super 8 Worldwide.

Steven W. Ouzts
Turner Padget
Post Office Box 1473
Columbia, SC 29209

Mr. Ouzts was retained by Seneca to provide legal services in the claims process and has information as to the process in which the claim progressed prior to litigation being initiated.

Suzanne Pucci
Dana Michelle Kaminer
Stanley Steemer of Columbia
701-B Buckner Road
Columbia, SC 29203

Stanley Steemer of Columbia is expected to testify as to their water mitigation and restoration efforts at the Property following the fire of June 14, 2013.

Stan Sanders
Wyndham Worldwide
3400 Peachtree Road, Suite 350
Atlanta, GA 30326

Julie Weiswasser
Senior Counsel
Litigation Department
Wyndham Worldwide
22 Sylvan Way
Parsippany, NJ 07054

Mr. Sanders and Ms. Weiswasser are expected to testify as to the franchise status of the Property prior to the date of loss and following the fire on June 14, 2013.

A.J. Shah
JAG Insurance Company
401 N. Tryon Street, 10th Floor

Charlotte, NC 28202

Mr. Shah was the broker who provided insurance coverage to Plaintiffs at the Property location and is expected to testify as to his personal knowledge of the allegations set forth in the Complaint and other pleadings and his interactions with Kislaya Sinha concerning the submission of the initial claim, as well as the submission and preparation of the Proof of Loss forms.

Arunima Sinha
106 Rusty Bard Road
Columbia, SC 29212

Mrs. Sinha is expected to testify as to her personal knowledge of the allegations set forth in the Complaint and other pleadings, as well as to the financial operations of the Cambridge Plaza Hotel.

Prem Sonekar
2233Two Notch Road
Lexington, SC 29073

Mr. Sonekar is a former employee of Vagish, LLC and was employed as the front desk clerk at the Cambridge Plaza Hotel on the day of the fire, and is expected to testify as to his personal knowledge of the allegations set forth in the Complaint and other pleadings.

Plaintiffs also anticipate that the following individuals may be called to offer testimony at the trial of this matter:

1. Any witness necessary to authenticate any exhibit or demonstrative aid;
2. Any witness listed by any other party;
3. Any witness necessary for impeachment or rebuttal purposes; and,
4. Any witness that has been deposed, who shall appear by depositions if unavailable for trial.

In addition to these witnesses, Plaintiffs expect there will be certain witnesses associated with Defendant that will be deposed pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedures. Plaintiffs anticipate deposing 30(b)(6) witnesses most knowledgeable of the facts and circumstances contained in the Complaint.

3. The names and subject matter of expert witnesses (if no witnesses have been identified, the subject matter and field of expertise should be given as to experts likely to be offered):

RESPONSE: Plaintiff identifies the following expert:

Maurice R. Kraut, CPCU
MASS, LLC
655H Fairview Road #350
Simpsonville, SC 29680
(864) 757-1058

Mr. Kraut will testify that Defendant did not handle the Vagish, LLC and Va Va Vagish, LLC claim properly, the actions of Defendant did not meet industry standards and were not reasonable, and the provisions of the South Carolina Improper Claims Practices Act were violated.

s/Richard A. Harpootlian
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Columbia, South Carolina
September 25, 2015